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December 19, 2023

VIA ECF

Hon. Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

**Re: United States v. Frank Butselaar
22 Cr. 560 (CS)**

Dear Judge Seibel:

I am the recently appointed attorney for Frank Butselaar, the defendant in the above-referenced matter, appointed pursuant to the Criminal Justice Act. I write requesting that the Court appoint an associate, Diane Fischer, to assist me in this case, including preparing for trial and assisting in a trial of this defendant, if necessary. Ms. Fischer recently assisted me in preparing for and conducting a trial before the Honorable Nelson Roman. She has also assisted me in several other federal criminal cases involving charges of financial crimes and where there was an extensive amount of discovery.

I am presently seeking authorization for Ms. Fischer to work up to 500 hours on this matter. Prior defense counsel and the Government have advised that the discovery in this case includes almost 400,000 documents. This application is being submitted without prejudice to any further application for additional authorized work as the need may arise. If approved, Ms. Fischer will work under my direction. Efforts will obviously be undertaken to not duplicate any efforts although if this case requires a trial I believe it is important and necessary for Ms. Fischer to appear with me at the trial. At the conclusion of this case, she will submit a voucher subject to Court approval. I am asking that Ms. Fischer be approved at a rate of \$125/hour, which according to Alan Nelson, the Circuit Case Budgeting Attorney, is a rate typical for associates with more than 8 years of experience. Ms. Fischer's resume will be submitted ex parte by separate transmittal.

If the foregoing meets with the Court's approval, then I respectfully request that Your Honor "So Order" this letter.

Thank you for your consideration in this matter.

Respectfully submitted,



Kerry A. Lawrence

cc: All counsel (via ecf and email)